

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

----- x Case No.: 15-CV-5737 (ADS)(ARL)

HUI LAN WENG,

Plaintiff,

**PLAINTIFF'S PROPOSED
VOIR DIRE FOR THE JURY**

-against-

FANCY LEE SUSHI BAR AND GRILL, INC. and
WINNIE LI, Individually,

Defendants.

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Plaintiff requests that prospective jurors be questioned as follows:

1. Do you or any member of your immediate family know the Plaintiff, Hui Lan Weng?
2. Do you or any member of your immediate family know the Defendant, Winnie Li?
4. Have you or any member of your immediate family ever had any dealings with Defendant Fancy Lee Sushi Bar and Grill, Inc. ("Fancy Lee")?
5. Have you or anyone you know ever been employed by Defendant Fancy Lee in any capacity? If so,
 - a. In what capacity?
8. Have you ever heard of the Defendants' attorney, William Wexler?
9. Have you ever heard of the Plaintiff's attorneys, Jessenia Maldonado or Steven Fingerhut?
10. Do you know any of the following individuals who may testify in this matter?
 - a. Hui Lan Weng
 - b. Winnie Li
 - c. Burton Brouard
 - d. Debbie Duffy
 - e. Lindsey Feeley
 - f. Anle Li
 - g. Wei Qi Shi
 - h. Yueng Wai
 - i. Tao Lin
 - j. Zhen Yuan

14. Is there any personal or religious belief that would prevent you from rendering an impartial verdict in this case?
15. Are you currently employed? If yes,
 - a. How long have you been with the Company?
 - b. What is your present position?
 - c. What are your responsibilities?
16. Have you ever supervised, managed or evaluated the work of any other employee(s)? If yes,
 - a. How many employees?
 - b. What was the nature of your supervision, management, or evaluation?
17. Have you ever been involved in an employment discrimination lawsuit? If yes,
 - a. What happened?
 - b. Do you remember who won?
 - c. If the plaintiff won, do you remember what the monetary award was?
 - d. Did you think it was fair?
 - e. To the extent that you have had this experience, would you tend to hold a bias or sentiment in favor or against either party in this case?
18. Have you or anyone you know ever been discriminated or retaliated against at work? If yes,
 - a. What were the circumstances surrounding the discrimination or retaliation?
 - b. What, if any, action was taken in response to the discrimination or retaliation and what was the outcome of any response to the discrimination?
 - c. To the extent that you have had this experience, would you tend to hold a bias or sentiment in favor or against either party in this case?
19. Have you or anyone you know ever initiated a complaint alleging discrimination or retaliation against an employer or co-worker? If yes,
 - a. What were the circumstances surrounding the event?
 - b. What was the result of the complaint?
 - c. To the extent that you have had this experience, would you tend to hold a bias or sentiment in favor or against either party in this case?
20. Have you or anyone you know ever initiated a lawsuit or filed an administrative complaint alleging discrimination or retaliation? If yes,
 - a. What were the circumstances surrounding the event?
 - b. What was the result of the action or proceeding?
 - c. To the extent that you have had this experience, would you tend to hold a bias or sentiment in favor or against either party in this case?

21. Have you or anyone you know ever been named as the defendant or respondent in a lawsuit or administrative proceeding alleging discrimination or retaliation? If yes,
 - a. What were the circumstances surrounding the event?
 - b. What was the result of the action or proceeding?
 - c. To the extent that you have had this experience, would you tend to hold a bias or sentiment in favor or against either party in this case?
22. Apart from discrimination or retaliation, have you or any member of your family been the plaintiff or defendant in a lawsuit? If yes,
 - a. What kind of case was it?
 - b. Were you the plaintiff or the defendant?
 - c. What was the outcome of the lawsuit?
 - d. To the extent that you have had this experience, would you tend to hold a bias or sentiment in favor or against either party in this case?
23. Have you ever testified in a legal proceeding? If yes,
 - a. When?
 - b. What were the circumstances?
 - c. To the extent that you have had this experience, would you tend to hold a bias or sentiment in favor or against either party in this case?
24. Are you or anyone you know employed by or in any manner involved with either the legal profession or the administration of justice? If yes, Please explain.
25. Have you previously served upon a jury? If yes,
 - a. When?
 - b. In what court?
 - c. Was it a criminal or civil matter?
 - d. What was the case about?
 - e. Was a verdict reached?
 - f. What was the verdict?
 - g. Can you put aside what you learned in that case, and the legal instructions you were given, and follow only the legal instructions given in this case?
 - h. Is there anything about the experience of serving as a juror in that case, make you believe that you cannot be fair and impartial in this case, or that you will have difficulty in rendering a verdict?
26. The Judge will instruct you on what the law is, and he will ask you to apply the law to the evidence presented in court. Would you have difficulty following the law, even if you think that the law is wrong?

27. Based on the Judge's instructions on the law, you will hear that the New York City Human Rights Law prohibits discrimination based on sexual orientation in the workplace. Would you have difficulty following the New York City Human Rights Law?
28. Is there any reason based on what you have seen and heard thus far and based upon your personal experiences, that makes you believe that you would hold a bias or sentiment either in favor or against either party in this case?
29. If the evidence warrants awarding money damages to Ms. Weng, will you be able to award such damages?
30. Do you believe that the work environment should be free from discrimination, harassment, and/or retaliation?
31. Have you, or anyone in your family, ever been discriminated against due to your gender? Please explain what happened.
32. Where do you get your news? (What television networks, newspapers, magazines, and/or websites?)
33. Do you or any member of your immediate family belong to a religious club or organization? If so,
 - a. What club or organization?
 - b. How long have you or your immediate family member been part of said club or organization?

Dated: New York, New York
May 1, 2017

Respectfully submitted,

PHILLIPS & ASSOCIATES
Attorneys At Law, PLLC

/s/
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